

From: Donaldson, Guy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D2A0969773664CC3B6EB1208748F1A5D-DONALDSON, GUY]
Sent: 8/13/2020 9:20:15 PM
To: Young, Carl [young.carl@epa.gov]; Paige, Carrie [paige.carrie@epa.gov]
Subject: RE: Draft Talking Points for the July Business Review

Thanks Carl. I will look at them tomorrow. I'm sorry I rushed you. I was thinking Business review was next week.

From: Young, Carl <young.carl@epa.gov>
Sent: Thursday, August 13, 2020 3:43 PM
To: Donaldson, Guy <Donaldson.Guy@epa.gov>; Paige, Carrie <Paige.Carrie@epa.gov>
Subject: Draft Talking Points for the July Business Review

The bowling chart for the SIP Metrics is below:

Metric ID	Performance Metric Title	Target Direction		Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Regional Metrics															
RM01. REGION 6.OAR	Number of Nonattainment Areas	Decreasing	Target	8	8	8	8	8	8	8	8	8	8	8	8
			Actual	8	8	8	8	8	8	8	8	8	8		
RM02. REGION 6.OAR	Number of SIPs acted on	Increasing	Target	6	0	1	1	0	1	0	5	3	2	2	0
			Actual	6	0	1	4	0	8	2	3	0	0		
RM03. REGION 6.OAR	SIPs Acted on within 18 Months	Increasing	Target	0	0	2	0	0	1	0	1	2	1	2	0
			Actual	0	0	0	4	0	4	0	3	0	0		
RM04. REGION 6.OAR	SIP Backlog	Decreasing	Target	18	21	21	20	21	23	28	23	21	20	20	20
			Actual	17	20	19	19	20	18	20	21	21	21		

Below are draft Talking points for David Garcia

RM01 (Number of Nonattainment Areas)

- As part of an A3 project Peter Tsirigotis, the Director of the Office of Air Quality Planning and Standards, sent out a letter to States encouraging them to work with EPA to redesignate areas that are now attaining National Ambient Air Quality Standards but are currently designated nonattainment.
- Peter encouraged Texas to work towards redesignating:
 - El Paso to attainment for the coarse particulate matter (PM-10) air quality standard.
 - Titus, Freestone and Anderson Counties to attainment for the sulfur dioxide air quality standard.
- Peter encouraged Louisiana to work towards redesignating St. Bernard Parish to attainment for the sulfur dioxide air quality standard.

RM02 (Number of SIPs acted on) and RM03 (SIPs Acted on within 18 Months)

- The last few months we've been discussing two key monthly bowling chart metrics for SIPs:
 - Metric RM02: "Number of SIPs acted on".
 - Metric RM03: "SIPs Acted on within 18 Months".
- In the July Business Review meeting David Gray said he preferred for Red to really be Red.

- In the case of Metric RM02 and Metric RM03 Red is not really Red, because the monthly SIP targets are not being met because annual SIP targets have already been achieved earlier in the fiscal year than anticipated.
- You may remember that in the June 22 Monthly Business meeting Henry Darwin provided a possible process for adjusting our SIP bowling chart targets.
- I followed up with Henry and others but so far there is no process for adjusting the SIP bowling charts.
- Most recently Betsy Shaw of OAR sent a July 29 email to Henry Darwin requesting an exemption from creating countermeasures for situations like ours rather than proposing target changes.
- In her email Betsy also noted that Regions have described the countermeasure requirement in such situations like ours as a “disincentive” and “penalty.”
- We appreciate Betsy’s request, but we’ll still have situations where Red does not really mean Red.
- Nevertheless, we developed countermeasures for Metrics RM02 and RM03.
- The major countermeasure we have for both Metrics is to develop responses to comments we received for 2 SIP proposals.

RM04 (SIP Backlog)

- Our target for July was 20, but we missed it slightly with 21 backlogged SIPs.
- We miscalculated on the number of backlogged SIPs we would have at the end of July.
- TCEQ has requested that we not act on one of the backlogged SIPs as it pertains to litigation on our approval of the Houston SIP for revoked ozone standards.

Carl Young
EPA Region 6 Air Quality Program
(214) 665-6645